

**BEFORE THE LAWYER DISCIPLINARY BOARD**

City Center East  
4700 MacCorkle Avenue SE, Suite 1200C  
Charleston, West Virginia 25311  
(304) 558-7999 • Facsimile (304) 558-4015  
Website: [www.wvdc.org](http://www.wvdc.org)

Date: March 15, 2011

1) **Complainant:**  
Your Name Mr. ( T ) John F. Tomasic  
Ms. ( )  
[First] [Initial] [Last]

Your Address: c/o Dr. Norman Gay N-3222  
[Street/Post Office Box]  
West Bay St  
Nassau, N.P. Bahamas  
[City] [State] [Zip]

Your Telephone: 305-812-5406 [Home] 305-454-5101 [Business]  
[Note: It is very important that we have your telephone number(s)]

2) **Attorney Being Complained Of:**

Name: Betty Pullin  
[First] [Initial] [Last]

Address: 300 Virginia St. East, Suite 4000  
[Street/Post Office Box]  
Charleston, W.Va. 25301  
[City] [State] [Zip]

Attorney's Telephone Number: 304-345-2200

3) Have you ever filed a complaint about this matter here or anywhere else?

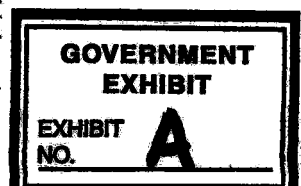
Yes [ ] No [ ☒ ] If yes, please explain: \_\_\_\_\_

4) Have you brought a civil or criminal action against this attorney:

Yes [ ] No [ ☒ ] If yes, please explain: \_\_\_\_\_

5) What kind of case or legal matter are/were you and this lawyer involved in? Ms. Pullin  
illegally seized my money; Ms. Pullin lied in  
her pleadings.

6) **DETAILS OF COMPLAINT:** [Write here or attach separate written explanation; attach copies of documents which help explain your complaint. Give date last unethical act occurred.]



### **Ethics complaint against Betty Pullin:**

Ms. Pullin has filed three separate In Rem Actions involving the same Search and Seizure Warrant. Ms. Pullin deliberately lied in her filings. The first In Rem, Docket #3 on 9-27-2010, failed to document the fact that the money in this account was from the settlement of the lawsuit against the Jail Authority of West Virginia, et al paid to me and the money from my mother's estate. Ms. Pullin had this exculpatory evidence available to her, yet, using kindergarten math, attempted to claim that the money was from the Practice at 35 West Third Ave., Williamson, W.Va. Instead of admitting her errors, Ms. Pullin filed a second In Rem on the same money, \$88,127.08, without sending a certificate of service to me or to my wife, Dr. Katherine Hoover. This is documented in Case No. 2:10-cv-1087 at docket number 22 filed on November 23, 2010. Ms. Pullin filled a default claiming that verified responses were not filed; or claiming responses were not filed to the second In Rem which she never sent to me.

In the third In Rem filed by Ms. Pullin, Case No. 2:11-cv-0101, she made the bald faced lie of claiming that our only income was from my wife's practice of medicine in Williamson, W.Va. Ms. Pullin had the exculpatory evidence in her possession until March 7, 2011 documenting that the money deposited in the WesBanco Account xxxx3002 was deposited in 2001, \$5,000.00 and March 12, 2004, \$22,000.00. Neither sum of money was from the practice of medicine by Dr. Hoover.

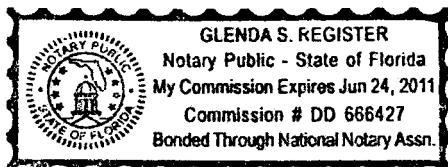
Ms. Pullin continues her lies by trying to connect my wife's practice with that of her friend, Dr. Diane Shafer. Although Dr. Hoover and Dr. Shafer have been good friends for many years, they have never had a business relationship. Ms. Pullin deliberately lied in her claim that the practices were related. She was attempting to discredit my wife with associations to people that she has erroneously claimed to have legal difficulties.

Ms. Pullin lacked in persona jurisdiction over me and my assets.

7) **OATH OF COMPLAINT:** The facts written above, and in attached letters and documents are known by me to be true or are believed to be true.

*Robert J. Tomasi*  
Signature

Subscribed and sworn before me this 16 day of March, 2011.



*Glenda S. Register*  
Official signature and official seal of notary